

### **REMARKS**

Claims 1-21 are all the claims presently pending in the application. Claims 1-4, 6, 7, 9-17, and 19 are amended. No new matter is added.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

The contents of the present Office Action are addressed in the following discussion.

#### **I. THE ALLOWABLE SUBJECT MATTER**

In the present Office Action, the Office admits that claims 2-10 and 14-16 are objected as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants appreciate and acknowledge the Office's notification. However, Applicants respectfully submit that all presently pending claims are in condition for allowance.

#### **II. THE PRIOR ART REJECTION – The Alleged Chung and Bae Combination**

Claims 1, 11-13, and 17-21 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over by Chung et al. (U.S. Patent Publication No. 2005/0078947 A1) in view of Bae et al. (U.S. Patent No. 7,356,248 B2).

Chung discloses an information storage medium storing subtitle and video mapping information. (Chung at Abstract.) Bae discloses an apparatus and method of reproducing a subtitle recorded in a digital versatile disk player. (Bae at Abstract.) The Office alleges that the combination of Chung and Bae makes the independent claims obvious.

However, while Applicants completely disagree with the Office's rationale in rejecting the previously presented versions of the independent claims, to expedite prosecution, the independent claims are amended to render the prior art rejection moot. Specifically, the alleged combination of Chung and Bae clearly fails to teach a non-transitory computer-readable storage medium, *“comprising . . . a plurality of items of subtitle data corresponding to the playback routes, the*

*subtitle data being configured to support a random search for a subtitle, the subtitle data comprising reference offset information indicating reference information configured to . . . randomly search for a subtitle of a desired time at a high speed; and reproduce the subtitle of the desired time*", as is recited, for example, in claim 1 and somewhat similarly with respect to the apparatus of claim 12 and the method of claim 17.

In detail, the Office uses claim 1 of Bae to allegedly teach the plurality of items of subtitle data, while simultaneously admitting that Chung fails to teach the plurality of items of subtitle data. However, claim 1 of Bae clearly fails to teach or suggest the subtitle data including reference offset information indicating reference information configured to randomly search for a subtitle of a desired time at a high speed; and reproduce the subtitle of the desired time. Thus, Bae is unable to make up for the admitted deficiencies of Chung. As a result, the independent claims are patentable over the alleged Chung and Bae combination.

Therefore, Applicants respectfully request the Office to reconsider and withdraw this rejection.

### III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicants submit that claims 1-21, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Office is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Office find the application to be other than in condition for allowance, the Office is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

Respectfully Submitted,



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